

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

BIG LOTS, INC., et al.,

Debtors.

)
) Chapter 11
)
) Case No. 24-11967 (JKS)
)
) (Jointly Administered)
)
) Re: Docket Nos. 9, 272
)

NOTICE OF WITHDRAWAL OF OBJECTION OF CERTAIN UTILITY COMPANIES
TO THE MOTION OF DEBTORS FOR ENTRY OF INTERIM AND FINAL ORDERS
(I) PROHIBITING UTILITIES FROM ALTERING, REFUSING, OR
DISCONTINUING SERVICE, (II) DEEMING UTILITIES ADEQUATELY ASSURED
OF FUTURE PERFORMANCE, AND (III) ESTABLISHING PROCEDURES FOR
DETERMINING REQUESTS FOR ADDITIONAL ADEQUATE ASSURANCE

Appalachian Power Company, Public Service Company of
Oklahoma, Southwestern Electric Power Company, Ohio Power
Company, Indiana Michigan Power Company, Arizona Public Service
Company, Ohio Edison Company, Potomac Edison Company, West Penn
Power Company, Pennsylvania Electric Company, Monongahela Power
Company, Metropolitan Edison Company, Pennsylvania Power Company,
Jersey Central Power & Light Company, Toledo Edison Company, The
Cleveland Electric Illuminating Company, Virginia Electric and
Power Company d/b/a Dominion Energy Virginia, Dominion Energy
South Carolina, Inc., Public Service Company of North Carolina
Incorporated, Georgia Power Company, PSEG Long Island, Salt River
Project, San Diego Gas and Electric Company, Southern California
Gas Company, Southern California Edison Company, Baltimore Gas
and Electric Company, Commonwealth Edison Company, PECO Energy

Company, The Potomac Electric Power Company, Delmarva Power & Light Company, Atlantic City Electric Company, Tampa Electric Company, Peoples Gas System, Inc., Entergy Arkansas, LLC, Entergy Louisiana, LLC, Entergy Mississippi, LLC, Entergy Texas, Inc., The Connecticut Light & Power Company, Yankee Gas Services Company, Public Service Company of New Hampshire, Eversource Gas of Massachusetts, NStar Electric Company, Western Massachusetts, NStar East Electric, Boston Gas Company, KeySpan Energy Delivery Long Island, Massachusetts Electric Company, Niagara Mohawk Power Corporation, Orange & Rockland Utilities, Inc., The East Ohio Gas Company d/b/a Enbridge Gas Ohio, Tucson Electric Power Company, UNS Electric, Inc., UNS Gas, Inc., Oklahoma Gas and Electric Company, Symmetry Energy Solutions, LLC, Constellation NewEnergy, Inc., Constellation NewEnergy - Gas Division, LLC, CenterPoint Energy Resources Corp., New York State Electric and Gas Corporation, Rochester Gas & Electric Corporation, Florida Power & Light Company, Central Maine Power Company and Public Service Electric and Gas Company (collectively, the "Utilities"), hereby withdraw their *Objection* (Docket No. 272) to the *Motion of Debtors For Entry of Interim and Final Orders (I) Prohibiting Utilities From Altering, Refusing, or Discontinuing Service, (II) Deeming Utilities Adequately Assured of Future Performance, and (III) Establishing Procedures For Determining Requests For Additional Adequate Assurance* (Docket No. 9), pursuant to a

settlement between the Utilities and the Debtors.

Dated: October 21, 2024

WHITEFORD TAYLOR & PRESTON LLC

/s/ William F. Taylor, Jr.
William F. Taylor, Jr. (#2936)
600 North King Street, Suite 300
Wilmington, Delaware 19801
Telephone: (302) 353-4145
Facsimile: (302) 357-3270
E-mail: wtaylor@whitefordlaw.com

and

LAW FIRM OF RUSSELL R. JOHNSON III, PLC
Russell R. Johnson III (VSB No. 31468)
John M. Craig (VSB No. 32977)
2258 Wheatlands Drive
Manakin-Sabot, Virginia 23103
Telephone: (804) 749-8861
E-mail:
russell@russelljohnsonlawfirm.com
john@russelljohnsonlawfirm.com

*Counsel for Appalachian Power Company,
Public Service Company of Oklahoma,
Southwestern Electric Power Company,
Ohio Power Company, Indiana Michigan
Power Company, Arizona Public Service
Company, Ohio Edison Company, Potomac
Edison Company, West Penn Power Company,
Pennsylvania Electric Company,
Monongahela Power Company, Metropolitan
Edison Company, Pennsylvania Power
Company, Jersey Central Power & Light
Company, Toledo Edison Company, The
Cleveland Electric Illuminating Company,
Virginia Electric and Power Company
d/b/a Dominion Energy Virginia, Dominion
Energy South Carolina, Inc., Public
Service Company of North Carolina
Incorporated, Georgia Power Company,
PSEG Long Island, Salt River Project,
San Diego Gas and Electric Company,
Southern California Gas Company,
Southern California Edison Company,
Baltimore Gas and Electric Company,*

Commonwealth Edison Company, PECO Energy Company, The Potomac Electric Power Company, Delmarva Power & Light Company, Atlantic City Electric Company, Tampa Electric Company, Peoples Gas System, Inc., Entergy Arkansas, LLC, Entergy Louisiana, LLC, Entergy Mississippi, LLC, Entergy Texas, Inc., The Connecticut Light & Power Company, Yankee Gas Services Company, Public Service Company of New Hampshire, Eversource Gas of Massachusetts, NStar Electric Company, Western Massachusetts, NStar East Electric, Boston Gas Company, KeySpan Energy Delivery Long Island, Massachusetts Electric Company, Niagara Mohawk Power Corporation, Consolidated Edison Company of New York, Inc., Orange & Rockland Utilities, Inc., The East Ohio Gas Company d/b/a Enbridge Gas Ohio, Tucson Electric Power Company, UNS Electric, Inc., UNS Gas, Inc., Oklahoma Gas and Electric Company, Symmetry Energy Solutions, LLC, Constellation NewEnergy, Inc., Constellation NewEnergy - Gas Division, LLC, CenterPoint Energy Resources Corp., New York State Electric and Gas Corporation, Rochester Gas & Electric Corporation, Florida Power & Light Company, Central Maine Power Company and Public Service Electric and Gas Company